



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 24, 2006

John Dougherty, Treasurer  
International Brotherhood Of Electrical  
Workers Local 98 Committee On Political Education  
1719 Spring Garden Street  
Philadelphia, PA 19130

**Response Due Date:**  
**March 27, 2006**

Identification Number: C00162818

Reference: Year-End Report (7/1/05-12/31/05)

Dear Mr. Dougherty:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B of your report discloses a total of \$11,522.76 in payments to your connected organization for "REIMB FOR GOTV EXPENSES 10/05," "REIMB FOR GOTV EXPENSES 11/05," "REIMB FOR GOTV EXPENSES 6/05" and "REIMB FOR GOTV EXPENSES 7/05-8/05". 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of corporate or labor organization resources in connection with a fundraiser may be permissible for certain fundraising activities only if the corporation or labor organization receives **advance** payment for the fair market value of such services. 11 CFR §114.2(f)(2)(i)(A), (C) and (E)

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